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By ECF

February 24, 2022

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

In Re: *New York City Policing During Summer 2020 Demonstrations*,
No. 20 Civ. 8924 (CM) (GWG)
This filing is related to all cases

Your Honor:

I am a Senior Counsel in the Office of Georgia M. Pestana, Corporation Counsel of the City of New York and I am among counsel for the defense in the above-referenced matter. I write to respectfully request an extension of the Court-ordered deadline of Friday, February 25, 2022 for defendants to provide the plaintiffs with a portion of the chart showing certain information for each of plaintiffs' document requests (Dkt #410). We have contacted the plaintiffs for their position and as of the time of filing this letter (after 7:00 p.m.) they have not gotten back to us.

Per Your Honor's order, defendants must create a chart that lists each document request, advises whether responsive documents will be or have been produced, and states whether any privilege or burden attaches to the response. As you can see from the attached spreadsheet, the plaintiffs in these consolidated actions have served 15 separate document requests, totaling more than 250 individual requests, many with multiple subparts. Counting the subparts brings the number of requests closer to 500. While compiling the chart to include the information Your Honor has ordered has been a very helpful exercise, it has proven to be an extremely time-consuming process. This is particularly true because many of the plaintiffs' individual requests are for documents pertaining to at least 83 different protest events. Preparing a chart of this size and scope has and continues to require a substantial time commitment by members of the team and as a result, defendants cannot fully comply with Your Honor's order by February 25th.

Defendants, working with NYPD, have partially completed the chart as directed and are prepared to provide plaintiffs with as much of the chart as is completed by tomorrow's deadline. In light of the other obligations of this case that the team is currently managing, including preparing for, taking, and defending depositions, as well as producing documents in anticipation of depositions and locating, preparing, and producing the documents requested in plaintiffs' requests,

we believe that we can complete the chart and ensure its accuracy and compliance with the Court's orders no later than next Thursday. As such, defendants respectfully request an extension until March 3, 2022 to provide the plaintiffs with the appropriate chart.

Thank you for your consideration herein.

Respectfully submitted,

Dara L. Weiss s/

Dara Weiss
Senior Counsel
Special Federal Litigation Division

Attachment

cc: ALL COUNSEL (via ECF only)